

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

NO. 3:24-cv-05095-BHS

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STATE OF WASHINGTON,
DEPARTMENT OF LABOR AND
INDUSTRIES,

SECOND DECLARATION OF
AMANDA SOLEIL MARIA
MUÑIZ

Plaintiff,

V.

GEO SECURE SERVICES, LLC, THE
GEO GROUP, INC.,

Defendants.

NO. 3:24-cv-05029-BHS

STATE OF WASHINGTON,
DEPARTMENT OF HEALTH,

Plaintiff,

V.

THE GEO GROUP, INC.

Defendant

I, AMANDA SOLEIL MARIA MUÑIZ, declare under the penalty of perjury under the laws of the United States that the following is true and correct.

1 1. I am over the age of eighteen and am otherwise competent to testify. I make these
 2 statements on personal knowledge and belief.

3 2. My legal name is Amanda Soleil Maria Muñiz. I go by Soleil in my work.

4 3. I am the Complaint Enforcement Lead for the State of Washington Department
 5 of Health (DOH or the Department) Office of the Assistant Secretary (OAS), which is part of
 6 DOH's Environmental Public Health Program, where I have worked since August 2023. I have
 7 a Master's Degree in International Policy Studies, Human Security, and Development from the
 8 Middlebury Institute of International Studies at Monterey.

9 4. I am the project manager that takes and investigates complaints or concerns from
 10 the public or any persons detained at a private detention facility in Washington State. I assist in
 11 planning and implementing the complaint resolution team, determining processes for
 12 complaints, assisting with rulemaking, seeking out opportunities for collaboration, and carrying
 13 out investigations.

14 5. DOH also has the general statutory authority to investigate public health threats.
 15 RCW 43.70.170. DOH considers suicide to be a public health threat.

16 6. On February 28, 2024, I went with my colleague, Kaye Eckmann, to visit
 17 Northwest ICE Processing Center. We arrived at 10:22 AM and logged in with the front desk—
 18 asking to speak to Mr. Scott. I told the front desk guard that we were here with the Department
 19 of Health. When the guard called Mr. Scott, he said that we had come from Pierce County
 20 Department of Health, so Kaye jumped in and said we were from the Washington State DOH,
 21 and the guard relayed that to Mr. Scott.

22 7. We waited in the waiting room for a while, until Mr. Scott came downstairs to
 23 meet with us. He was accompanied by a gentleman—Mr. Santiago. I asked Mr. Santiago if he
 24 had a business card we could have, but he said he did not. I clarified with him his position and
 25 he told me he is a supervisor at the facility. I let Kaye do most of the talking, as I had bronchitis
 26 and had lost the majority of my voice. To clarify, I had bronchitis, but it was not contagious and

1 I wore a mask the entire time we were there. I also did not shake hands with the gentlemen (Kaye
 2 did), though I told them I would but my bronchitis was making me cough and so for their sake I
 3 was not going to shake hands with them. Mr. Scott agreed that was for the best.

4 8. Kaye spoke with both gentlemen, letting them know we were there as part of our
 5 monthly visits in being transparent and sharing some of the top concerns that we are receiving
 6 as complaints. She talked about the complaints we have received about the lack of cleanliness in
 7 the bathrooms, which is resulting in fungus growing on the detainees' themselves. I mentioned
 8 that we had heard that the facility had contracted with a cleaning company that had come in to
 9 clean the bathrooms, and that I was wondering if they wanted to share with us who they had
 10 contracted with. I was very clear that I was asking them to share according to their comfort level
 11 and nothing more. Mr. Scott replied that he preferred not to share that information that day, and
 12 we moved on with the conversation. Kaye then told them about the rest of the top complaints
 13 received. These were that meals were arriving several hours late, which means that there is an
 14 extensive time gap in between meals for detainees; that there are concerns that the HVAC is not
 15 working properly and that detainees have been asking for blankets because it is so cold they
 16 cannot sleep at night. Once she was done sharing these concerns with the two gentlemen she
 17 repeated that we just wanted to be transparent with them, and I added that this was why we had
 18 been coming by monthly to visit them. Mr. Santiago nodded and smiled; Mr. Scott had no visible
 19 response. We then said our goodbyes, Kaye shook hands with both gentlemen again (I did not
 20 because of my bronchitis). We signed out at 10:49 AM and left the facility.

21 9. We have continued to receive complaints from individuals held at the NWIPC
 22 since the beginning of the year. We have been told multiple times that detainees have to wait six
 23 to eight hours in between meals, and that food allergies and restrictions are not being respected—
 24 a recent example being a detainee who stated he has gone several days without eating multiple
 25 times due to his food having onions in it despite his medical paperwork making it clear he is
 26 allergic to onions. We have received multiple complaints about the cleanliness of the living pods,

1 the bathrooms, and personal hygiene; we have been told cleaning has been reduced to only once
 2 a day, and the cleaning team has been reduced from five people, to just two people; we have
 3 been informed that toilets and sinks are consistently clogged and overflowing and that several
 4 days will go by without anyone coming to fix them; and we have had detainees complain that
 5 they have not received any clean clothes—including clean underwear.

6 10. It has been difficult to hear about these complaints, but the ones we are the most
 7 concerned about are the health-related complaints. From the beginning of our program, we have
 8 received weekly complaints and notifications of widespread hunger strikes at the facility due to
 9 bad and worsening conditions. We have received complaints from detainees who have been
 10 physically assaulted by GEO officers, which has led to a lot of fear around interactions with the
 11 guards. One of the individuals who has reported harassment from the guards was told—“[that]
 12 I’m just a immigrants. Nobody is going to believe me.” We have received complaints from a
 13 detainee who had eye surgery five months ago and has not had a follow-up check-up with a
 14 doctor; he was told to stop complaining as they would not be taking him to medical. We also
 15 received a complaint from a detainee that was given medicine post-surgery that her medical chart
 16 clearly says she is allergic to. We also received a report from a detainee that went to medical,
 17 complaining of chest pain, and all he was given for it was Tylenol. Eventually, and after much
 18 fuss from him, he was finally taken to the hospital.

19 11. We have also received multiple notifications of individuals having suicidal
 20 ideation, or even attempting suicide, due to conditions at the facility. We were told that four
 21 people attempted suicide in November, 2023.

22 12. On March 7, 2024, there was a death at the NWIPC. We have not received his
 23 name or the official cause of death from the relevant authorities. Witnesses at the facility have
 24 identified him and told us that he died by self-inflicted strangulation/hanging. We have received
 25 grievances in regard to this, as individuals detained at the facility are very afraid about their own
 26 deteriorating mental health and that of their fellow detainees. We were also informed through

news alerts put out by community advocates that there have been two more active suicide attempts since March 7.

13. Based on the complaints my team has received from individuals detained at the NWIPC, and having been made aware of the living and medical conditions at the facility, I believe there are threats to public health at the facility. I feel that it is of vital importance that I be allowed to fulfill the job I was hired to do, which is to investigate incidents like the ones I have outlined above.

I declare under the penalty of perjury under the laws of the United States and the state of Washington that the foregoing is true and correct.

SIGNED this 22nd day of March, 2024 in Olympia, Washington.

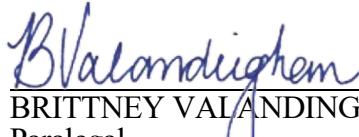
Soleil Muñiz

SOLEIL MUÑIZ
Federal Complaint Enforcement Lead
Washington State Department of Health

1 **CERTIFICATE OF SERVICE**

2 I hereby declare that on this day I caused the foregoing document to be electronically
3 filed with the Clerk of the Court using the Court's CM/ECF System, which will serve a copy of
4 this document upon all counsel of record.

5 DATED this 22nd day of March 2024 at Seattle, Washington.

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7 _____
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